

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

MARIA ALSINA ORTIZ, ET AL.

Plaintiffs

V.

ZOE LABOY ALVARADO, ET. AL.

Defendants

CIVIL CASE NO. 98-1893 (CC)

**PLAINTIFFS DEMAND
TRIAL BY JURY**

DEFENDANTS' PROPOSED VOIR DIRE

COME NOW Defendants, through the undersigned attorneys, and respectfully submit the following proposed jury voir dire:

1. Name.
2. Age.
3. Civil Status.
4. Children.
5. Profession.
6. Employment History.
7. Do you know the plaintiffs?
8. Do you know plaintiff's counsel, Glen Carl James?
9. Do you know defendants' counsel, Lavy Aparicio López,?
10. Are you involved in any way with plaintiff's claim and/or the instant case?
11. Do any of your friends and relatives work with any of the parties?
12. Have you ever been called for jury duty?
13. When and where were you called for jury duty?

14. Did you actually hear a case and deliberated on a verdict?
15. What kind of case was that?
16. Did anything happen during your experience in that case that would affect your decision in this case?
17. Will you set that case aside and decide this case on the evidence you hear and the instructions of the court?
18. Have you and/or any of your family members and/or friends ever filed a complaint against the Government of Puerto Rico, any of its agencies, or officials?
19. Have you ever been a party or a witness to any lawsuit?
20. What were the circumstances of those cases?
21. Would you be able to set aside your experience in that or those cases and decide this case solely on the evidence you hear in court?
22. Would you be affected by the outcome of this case?
23. Have any of you received previous information about this case?
24. Have you ever been criminally investigated, accused, arrested and/or sentenced?
25. Have any family member and/or any close acquaintance ever been criminally investigated, accused, arrested and/or sentenced?
26. Have you ever been subject to an intervention by a policeman?
27. Have any members of your family ever been subject to an intervention by a policeman?
28. Have you and/or any family member ever been incarcerated in a correctional facility in Puerto Rico?
29. Have you and/or any family member ever filed a complaint against the Correctional System?
30. What is your perception of the correctional system in Puerto Rico?

31. Do you believe in the rehabilitation of a prisoner?
32. Does anything about this case prevent you from being fair and impartial?
33. Do you see any reason that would impede you to be a jury at this trial?
34. Do you believe that just because the plaintiff filed a lawsuit against the defendants he is entitled to recover damages?

WHEREFORE, the appearing Defendants very respectfully request that this Honorable Court take notice of the above.

I HEREBY CERTIFY that on the 21nd day of November 2005, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will sent notification of such filing to the attorneys of record.

RESPECTFULLY SUBMITTED.

At San Juan, Puerto Rico, this 21nd day of November 2005.

ROBERTO J. SANCHEZ RAMOS
Secretary of Justice

ARLENE GARDON RIVERA
Assistant Attorney General
In Charge of Litigation

JO-ANN ESTADES BOYER
Director of the Federal Litigation Division

S/Lavy Aparicio López
LAVY APARICIO LOPEZ
Attorney at Law
USDC-PR Bar No. 219503

**Department of Justice of the
Commonwealth of Puerto Rico**
P.O. Box 902192
San Juan Puerto Rico 00902-0192
Tel. (787) 721-2900 Ext. 2615
Fax: No. (787) 723-9188
E-Mail: laaparicio@justicia.gobierno.pr